

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS' UNOPPOSED MOTION TO  
AMEND PLAINTIFFS' EXHIBIT LIST TO INCLUDE EXPERT CVs<sup>1</sup>**

Plaintiffs move to amend Plaintiffs' Exhibit List to add the CVs of Plaintiffs' experts Goranka Bjedov, Paul Crisci, Robin Lee, and Jon Weissman. These CVs were included in the respective expert reports' appendices, and are attached hereto as **Exhibits A, B, C, and D**.

The proposed Amended Exhibit List is attached hereto as **Exhibit E**.

Local Rule 16 provides that parties can seek to amend scheduling orders upon a showing of good cause.

Plaintiffs timely filed Plaintiffs' Trial Exhibit List on August 15, 2025 (ECF No. 1565), in accordance with this Court's Order of August 5, 2025 (ECF No. 1560). As noted on the cover page of Plaintiffs' Trial Exhibit List, Plaintiffs reserved the right to seek the Court's leave to amend or supplement their exhibit list. (ECF No. 1565).

Good cause exists to amend Plaintiffs' exhibit list to include Plaintiffs' experts' CVs because they are relevant to Plaintiffs' claims, are relevant to Google's motion to exclude one of Plaintiffs' experts filed after the exhibit lists were filed (see, e.g., ECF Nos. 1580), are already in Google's possession, are included in the respective experts' reports, and submitting the CVs as

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<sup>1</sup> Plaintiffs reserve the right to seek the Court's leave to further amend their exhibit list.

exhibits at trial will streamline the presentation of Plaintiffs' expert credentials. Google has indicated that it does not oppose this motion.

**WAIVER OF ORAL ARGUMENT:**

Plaintiffs waive oral argument on this procedural motion.

Dated: September 12, 2025

Respectfully submitted,

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